



U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a prep label, affix it in the space at left. If any information on the label is incorrect, draw through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a prep label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a person's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. Information requested herein is required by (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.

PAD002274975

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

~~SCOTT PAPER COMPANY~~
1500 E SECOND ST
EDDYSTONE, PA 19013

III. LOCATION OF INSTALLATION

1500 E SECOND ST
EDDYSTONE, PA 19013

See letter
10/28/83

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)

PAD002274975

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I. NAME OF INSTALLATION

SCOT FOAM CORPORATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

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CITY OR TOWN

ST.

ZIP CODE

4

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16

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

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CITY OR TOWN

ST.

ZIP CODE

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IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

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V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

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B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)

F = FEDERAL

M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION

☐ B. TRANSPORTATION (complete item VII)

☒ C. TREAT/STORE/DISPOSE

☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR

☐ B. RAIL

☐ C. HIGHWAY

☐ D. WATER

☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION

☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D.

PAD0022749

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

WPA0002274975

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1 23 - 26	2 23 - 26	3 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 F 0 0 2 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U 0 1 3 23 - 26	32 U 0 8 0 23 - 26	33 U 2 2 3 23 - 26	34 U 2 2 6 23 - 26	35 U 2 2 9 23 - 26	36 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)


☐ 2. CORROSIVE
(D002)

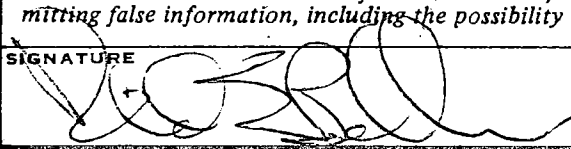
☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE



NAME & OFFICIAL TITLE (type or print)

Donald E. Bellew
Manager of Manufacturing

DATE SIGNED



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

•PAD002274975

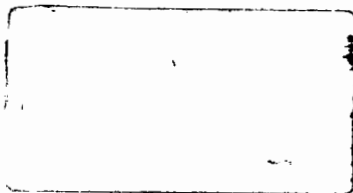
SCOTT PAPER COMPANY
1500 E SECOND ST
EDDYSTONE

PA 19013

INSTALLATION ADDRESS

1500 E SECOND ST
EDDYSTONE

PA 19013





A Limited Partnership

December 23, 1991

Certified Mail No. P 663 683 013
Return Receipt Requested

U.S. Environmental Protection Agency
Region 3
P. O. Box 1480
Philadelphia, PA 19170

Re: Foamex L.P. Facility
1500 East Second Street, Eddystone, PA 19022
EPA ID# PAD002274975

Ladies and Gentlemen:

Foamex L.P. has certain reporting requirements/authorizations/permits (collectively "permits") with respect to the above-referenced facility. This letter serves as notification of a pending change in the equity partnership interests of Foamex L.P., which is anticipated to occur on or about December 31, 1991. Management and operations at the plant level will remain the same. Additionally, Foamex L.P. will not undergo a name change, nor will any of the existing financial assurance mechanisms be affected.

Foamex L.P. hereby requests that you please note the above-referenced change, as appropriate, and file a copy of this letter in your records. It is not anticipated that the contemplated change in equity ownership will produce any changes in the operating conditions, including changes that would change the type or increase the quantity of any pollutants emitted or discharged. Foamex L.P. will remain responsible for the conditions of, liability for, and compliance with the permit provisions currently in effect.

Unless a response is received to the contrary, Foamex L.P. will assume that nothing further is required by you of Foamex L.P. in this regard. If you need any additional information, please contact the undersigned at (401) 438-0900.

Very truly yours,

FOAMEX L.P.

By: Arthur R. Pereira

Arthur R. Pereira
Corporate Environmental
Coordinator

cc: Mr. M. Kazio
Mr. E. W. Griffiths

823 Waterman Ave
East Providence RI 02914
Phone: 401 438 0900
FAX: 401 438 4205

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PA SECTION

FEB 4 1992

EPA, REGION 3

COMHE
OFFICE OF HAZARDOUS WASTE
JUN 3 1990

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FORM 33
RESOURCE RECOVERY AND OTHER
PROCESSING FACILITIES

General Reference: Chapter 283 and Act 101—Section 510(b)

Instructions: The following items are application requirements for resource recovery and other processing facilities. Attach applicable information on 8½ x 11 inch sheets of paper with "Form 33" and the type of the facility on the top of the sheet with the question numbers referenced.

A. Operating Plan:

1. Description of general operating plan:

SEE ATTACHMENT A.1

2. Solid Waste

a. Origin FOAMEX L.P.
EDDYSTONE, PA

b. Composition TYPE 0 AND TYPE 5 WASTES

c. Weight or volume (cubic yards, tons) 10,500 CUBIC YARDS/YEAR

3. Process to be used:

INCINERATION TO STERILE ASH

4. Daily operational methodology of process and method of waste measurement:

SEE ATTACHMENT A.4

5. Description of how the following wastes will be prevented from being accepted at the facility.
- Special handling wastes and residual wastes unless specifically approved by the Department.
SEE ATTACHMENT A.5a
 - Hazardous and explosive wastes.
SEE ATTACHMENT A.5b
6. Loading rate 500#/HR TYPE 0, & 75#/HR TYPE 5
7. Capacity of facility 1090#/HR TYPE 0 WASTE
8. Expected life 10 YEARS
9. Plan for an alternative waste handling or disposal system during periods when the proposed facility is not in operation, including procedures to be followed in case of equipment breakdown. Procedures may include the use of standby equipment, extension of operating hours and contractual agreements for diversion of municipal waste to other facilities.

SEE ATTACHMENT A.9

10. Plan for operational safety, fire prevention and emergency response, that will adequately protect workers and patrons of the facility, prepared by an expert in the field of industrial hygiene and safety.

SEE ATTACHMENT A.10

1. Plan for hiring and training equipment operators and other personnel concerning the operation and approved design of the facility.

The present equipment operator has been running the incinerator since it was built. This is a dedicated position. In the event this person plans to retire, Foamex would assign a new operator from the in house staff to replace him. The new operator would work with the present operator full time until he was fully capable to handle the equipment. This on site training would be supplemented by having him take the E.P.A. Incinerator Operator Training Course.

12. Operating hours of facility: Normal operation - 7:00 a.m. to 3:00 p.m.
5 Days Per Week

B. Design and related information.

Include a narrative description of:

1. Sources, types, and weight or volume of solid waste to be processed, including data on moisture content of waste, and information concerning special environmental pollution or handling problems that may be created by the solid waste.
SEE ATTACHMENT B.1
2. Methods to be used to control the flow of waste to the facility, including a flow chart with a materials balance depicting the processing of solid waste and mechanical components of the processing system.
SEE ATTACHMENT B.2
3. Interior dimensions of the tipping floor, storage area and, when applicable, ingress and egress thereto.
SEE ATTACHMENT B.3
4. Size, type, capacity and general specifications of the equipment for the handling, processing and storage of waste.
SEE ATTACHMENT B.4
5. Anticipated recovery rate of marketable materials or energy.
SEE ATTACHMENT B.5
6. Actual or expected physical and chemical composition of ash, residue or wash water produced by operation of the facility.
SEE ATTACHMENT B.6
- ☒ 7. The proposed location and method for disposal, storage or processing of ash, residue or wash water produced by operation of the facility.
SEE ATTACHMENT B.7
8. Plan for separation, storage and ultimate disposal of unmarketable waste generated by the process, including plans for the temporary storage of bulky waste.
SEE ATTACHMENT B.8
9. Minimum and maximum volume or weight of the types of material or solid waste to be prior to sale, reuse or disposal, and the minimum and maximum time that material or waste is to be stored.
SEE ATTACHMENT B.9
10. Plan for disposal or processing of waste if the facility or a processing line within the facility is closed or shut down.
SEE ATTACHMENT B.10
11. Utilities to be installed at the facility.
SEE ATTACHMENT B.11
12. Plans and designs for operating and maintaining the proposed facility to prevent fires, explosions, the emission of noxious or toxic gases and other emergencies.
SEE ATTACHMENT B.12
- ☐ 13. A plan for the repair or replacement of equipment in the event of equipment breakdown, including plans for obtaining spare parts.
SEE ATTACHMENT B.13

C. Plan for access roads NOT APPLICABLE, EXISTING FACILITY, ASPHALT ROADS

1. Designs, cross-sections, and specifications for access roads, including load limits.
2. Describe the Access Road Plan, including designs, cross-sections and specifications.
 - a. Explain how the access roads will be designed, constructed and maintained to prevent erosion, and sediment to streams or runoff.
 - b. Will streams or waterways be crossed? ☐ Yes ☒ No

If yes, explain how the applicant will meet the requirements of Chapter 105. _____

c. Describe the drainage system for temporary and permanent roads to be located at the proposed facility. NOT APPLICABLE

d. Explain what materials are to be used on permanent or temporary roads at the proposed facility:

- ☒ paved asphalt
- ☐ gravel
- ☐ cinders
- ☐ or equivalent material—explain _____

Will the grade of any access road be greater than 12%? ☐ Yes ☒ No

If yes, explain _____

☐ e. Explain the locations, widths and methods of maintenance for all access roads to be located on the proposed permitted facility, and property. NOT APPLICABLE

D. Soil erosion and sedimentation control plan. NOT APPLICABLE

1. Plan to manage surface water and control erosion during phases of construction and operation of the permit area. Calculations shall be based on 25 year, 24-hour precipitation events.
2. Plan should include dimensions of diversion ditches (length, gradient, cross section for configuration by reach) and capacities of ditch volume by reach. Design calculations should be included.
3. Plan for collection, disposal, or treatment of rinse water and leachate.

E. Soil and groundwater monitoring plan (If required by the Department). NOT APPLICABLE

☐ F. Nuisance control plan
Plan to prevent and control hazards or nuisances from vectors, odors, noise, dust, and other nuisances not otherwise provided for in the permit application. Plan must provide for routine assessment of vector infestation and for countermeasures to be taken. Plan may include a control program involving a contract for an exterminator. SEE ATTACHMENT F

G. Litter control plan SEE ATTACHMENT G
Describe the Litter Control Plan, and explain how the operator will prevent litter from blowing or becoming deposited off-site.

- a. Explain the types, locations and maintenance procedures for litter fences to be used at the proposed facility.
- b. Explain the frequency of litter pick-up and disposal.

H. Public and Private Water Supply for Resource Recovery Facilities over 50 tons/day Capacity.
Provide a study of the short-term and long-term effects that the facility will have on the quality and quantity of public and private water supplies. The study shall include, but not be limited to, effects of pollution, contamination, diminution, and alternative sources of water adequate in quantity and quality for the purposes served by the water supply both public and private. SEE ATTACHMENT H

FORM 33

INCINERATOR
FOAMEX L.P.

ATTACHMENT A.1 DESCRIPTION OF GENERAL OPERATING PLAN

The incinerator/energy recovery boiler at Foamex L.P. is being used to incinerate approximately 90% of the plant trash generated at the facility, in Eddystone, PA. Incineration is accomplished by a Kelley Model 1280/72, two stage pyrolytic incinerator. The unit is fitted with the Kelley liquid waste injection system option. Steam is produced by reclaiming waste heat through an energy recovery boiler. This boiler is the lead boiler in the winter heating season, working in tandem with the main boiler plant. During warmer weather seasons, the energy recovery boiler provides the entire plant requirements for steam.

The main business of the Foamex L.P. plant is the manufacture of flexible polyurethane foam. This is accomplished by reacting toluene-diisocyanate (TDI) with various polyol resins. Polyol resins are high molecular weight, long chain compounds containing multiple hydroxyl groups. The foam is post processed into carpet underlay, mattress cores, reticulated, laminated, or coated forms for distribution to Foamex customers.

All burnable municipal trash from the Foamex facility is collected and stored in cardboard gaylords, 48" x 48" x 42" in size. These gaylords are delivered to the incinerator area by forklift. Wooden pallets are delivered from the receiving and breakdown areas "as is" by forklift. Liquid wastes are collected in five or fifty-five gallon drums and delivered to the Kelley liquid waste injection system, located in the incinerator room.

Non-burnable wastes are collected and stored in dumpsters for off-site removal.

Hazardous wastes are collected and stored for off-site removal and disposal to a D.E.R. approved facility.

The incinerator unit operates one shift per day, 7:00 a.m. to 3:00 p.m. During increased levels of plant activity, operating hours may be extended by up to three hours, or an occasional Saturday.

Waste will be charged to the incinerator in compliance with the specifications and conditions as stated in the Bureau of Air Quality Operating Permit No. 23-301-099A. Empty gaylords will be returned to their point of origin for refilling.

Ash from the incinerator is emptied weekly and stored in a tarped container. The ash storage container is removed from the facility when full and disposed at the Grand Central Sanitary Landfill.

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT A.4 DAILY OPERATIONAL METHODOLOGY OF PROCESS AND
METHOD OF WASTE MEASUREMENT

Wastes destined for incineration are moved by forklift on a daily basis to the incinerator room for processing or short term storage.

Rolls of paper used in the foam production process which are too large to be fed into the incinerator are processed first through the shredder, located in the incinerator room, to reduce their size and increase their burning efficiency.

The incinerator is started up to preheat the secondary combustion chamber to 1800 degrees fahrenheit.

The number of feeds, (gaylords), processed through the incinerator are recorded on a daily basis. A loaded gaylord typically weighs 135 pounds. This is used to calculate the daily pounds of waste processed per day. Gaylords full of waste are randomly weighed during the year to confirm the validity of the 135 pound figures.

Liquid waste is automatically pumped into the incinerator at a controlled rate. The liquid feed rate is modulated and controlled by the incinerator exhaust temperature. Control temperature set points assure proper flow of liquid waste to maintain minimum combustion temperatures. A detailed explanation of the flow control process is included with the Kelley vendor information provided in the addendum to this Form 33.

Measurement of the liquid waste processed through the incinerator is by gallons. This is determined from the daily run tanks on the Kelley liquid waste injection system. Quantities and material descriptions for each liquid waste injected to the incinerator are recorded in the daily operations logs for the incinerator.

The incinerator hearth is typically cleaned on Mondays. Ash is removed from the main chamber and loaded into the ash bucket. This ash bucket is then removed from the incinerator room and emptied into the ash storage container, a 35 cubic yard, tarped, roll-off container, which is located outside the incinerator room. The ash bucket used to collect the ash coming from the incinerator is 16 cubic feet in volume. Loaded ash buckets have been weighed and the ash density is known. This volume and density information is used to compare to the weights reported when the ash is disposed of at the Grand Central Sanitary Landfill.

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT A.5.a SPECIAL HANDLING WASTE AND RESIDUAL WASTE

Special wastes are municipal wastes that require the application of special storage, collection, transportation, processing or disposal techniques due to quantity of material generated or its unique physical, chemical, or biological characteristics. The term includes sewage sludge, infectious waste, chemotherapeutic waste, and ash residue from a municipal waste incineration facility.

The Foamex L.P. campus is presently permitted to incinerate Type 0, and Type 5 waste. This facility will not process sewage sludge or ash residue. Foamex does not generate infectious waste or chemotherapeutic waste.

The operator of the facility is the quality control point. The operator is trained not to accept into the facility any materials which are not included in the permit. This is a condition of the operator's employment. Failure to comply would result in suspension, replacement or dismissal.

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT A.5.b. HAZARDOUS AND EXPLOSIVE WASTES

Hazardous wastes are garbage, refuse, or sludge from an industrial or other waste water treatment plant; sludge from a water supply treatment plant or air pollution control facility; and other discarded material, including solid, liquid, semisolid or contained gaseous material resulting from municipal, commercial, industrial, institutional, mining, or agricultural operations, and from community activities; or a combination of the above.

Hazardous materials are identified by the material safety and data sheets. Foamex's Environmental Department monitors all activity relating to hazardous wastes, and explosive wastes. The hazardous wastes and explosive wastes will be collected using procedures outlined in O.S.H.A. guidelines and hazardous waste management regulations. The hazardous wastes are then removed from Foamex by a licensed contractor. There will be no change in this present policy.

The operator of the facility is the quality control point. The operator will be trained not to accept into the incinerator facility any materials which may be hazardous or explosive wastes. This will be a condition of the operator's employment. Failure to comply would result in suspension, replacement or dismissal. The Manager of Product Control is on-site daily to answer any questions from the incinerator operator.

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT A.9 ALTERNATE WASTE HANDLING PLAN

In the event that the incinerator system equipment or the energy recovery boiler breaks down or is shutdown for extensive maintenance, the following procedure is initiated for waste disposal. Gaylords of full trash will be stored in the storage area in the incinerator room. A back-up storage area is also available directly next to the incinerator room. Depending on the anticipated length of down time for the incinerator, Foamex will decide if direct off-hauling of Type O waste is applicable. The facility has storage capacity on site for approximately four days of trash generation. If off-hauling is required, Foamex will contact their vendor, Banta's County Disposal Container Service, to ship 40 cubic yard containers to the facility. Excess waste will be loaded into these containers until the incinerator is brought back on-line for processing.

Once the incinerator is operating and processing waste, the operating hours will be extended by three hours per day until the stored waste is eliminated and normal operations can resume.

Type 5 hazardous waste will be stored in 55 gallon drums and held in the designated hazardous waste storage area. These materials are then picked up for off-site disposal by a licensed contractor. Foamex L.P. has used Safety-Kleen Corporation and Stout Environmental in the past for these services. Foamex L.P. adheres to the Pennsylvania Code Hazardous Waste Regulations as published under Title 25, Chapters 260-270, and the Federal EPA Regulations for hazardous waste.

Type 5, non-hazardous waste polyols, are stored in two 5,000 gallon storage tanks. One of these tanks is located within a secondary storage containment reservoir, and the other tank is located within a concrete block building. These tanks are connected by piping to the liquid waste injection system. Waste fuel oil, waste lubricating oil, waste methanol, and waste Di-Methylformamide are stored in 55 gallon drums in the area of the liquid waste injection system, for processing through the incinerator.

FORM 33

INCINERATOR

FOAMEX -L.P.

ATTACHMENT A.10 OPERATIONAL SAFETY, FIRE PREVENTION, AND
EMERGENCY RESPONSE

OPERATIONAL SAFETY:

Storage: All Type 0 wastes are placed in cardboard containers, gaylords and are stored in the storage room and incinerator facility. Type 5 wastes are stored in 55 gallon drums in the area of the liquid waste injection system. These wastes include waste fuel oil, waste lubricating oil, methanol and Di-Methylformamide (DMF), which are processed through the incinerator. Waste polyols are stored in the two 5,000 gallon storage tanks. This waste is also processed through the liquid waste injection system. The incinerator operator will be responsible for monitoring conditions of waste received to assure it is received as mentioned above and that non-burnables, special wastes, and hazardous wastes are not in the incinerator waste stream. The incinerator operator will be responsible for cleanliness of area, waste stored, vector control, and fire prevention.

Ash Removal: Ash removal is performed at the start of the incinerator operation, once a week, and typically on Monday mornings. This sequence has allowed the incinerator to cool to ambient temperature over the weekend. The operator shall verify the shut down time of the incinerator and chamber temperature. The operator enters the chamber wearing safety shoes, safety glasses, gloves and a respirator. A portable fire extinguisher is mounted by the incinerator ash pit area. This process is repeated until all the incinerator ash has been removed. The door is to be closed and secured. Any ash which fell to the floor during this operation is to be picked up with a coal shovel. The operator shall cautiously crack the incinerator ash door, open slowly while standing behind the door, pausing for ten seconds. He then continues with opening the door. The operator then manually shovels the ash out of the main chamber into the ash bucket. When full, the ash bucket is removed and dumped into the ash storage container located outside the incinerator room. The operator shall then inspect the incinerator underfire air system and the inside of the incinerator primary chamber. At this time if any underfire air holes are blocked the operator will clear the obstruction by "punching the hole." Any deficiencies shall be noted and reported to engineering management.

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT A.10 OPERATIONAL SAFETY, FIRE PREVENTION, AND
EMERGENCY RESPONSE (CONT'D)

Incinerator Operation: The incinerator operator is required to wear eye protection, foot protection, and safety glasses at all times. On start-up the incinerator operator verifies that all incinerator systems are operational. The incinerator operator shall ready material for loading. When the charging door opens the incinerator operator manually loads the hopper. The operator shall then activate the load button and repeat the cycle. Once a load is charged the operator shall never manually open the charging door. On shut-down the operator shall activate automatic burn-down sequence and clean the area.

The incinerator operator is responsible for visual inspection of the unit prior to and during operation. This includes monitoring the system daily for leaks, spills, and fugitive emissions. System alarms are checked daily for proper operation. Stack emissions are observed daily for excessive smoke or odor. Any data that indicates a emissions parameter is being violated will be investigated by the operator. If it exceeds the B.A.T. requirement the operator locks out the incinerator feeder and operations cannot resume until the problem is corrected. If the problem cannot be resolved, the operator will place the unit in burn down and notify engineering management. The entire episode will be recorded in accordance with D.E.R. regulations. Anyone who is unqualified as an incinerator operator will not be allowed to operate the incinerator.

Fire Prevention: Fire prevention for this operation is part of Foamex's current fire protection program. Daily monitoring of waste storage will be conducted.

The incinerator room is constructed of masonry block walls and a concrete floor. The room is separated from the rest of the facility by 2-hour fire rated doors. The entire Foamex facility is constructed with sprinkler piping and hose reel stations located throughout. Portable fire extinguishers are installed in the incinerator area. There is a telephone, and a plant central paging speaker located in the incinerator room.

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT A.10 OPERATIONAL SAFETY, FIRE PREVENTION, AND
EMERGENCY RESPONSE (CONT'D)

Emergency Response: In case of fire or explosion the building fire alarm will be activated. The guard will then contact the local fire company by telephone. All personnel will evacuate the building. All electrical and gas service to the building will be shut off. Foamex Management will take necessary measures to ensure all personnel are evacuated from the building, care for the injured, and direct the local fire company to the scene of the event.

In the event of splashing by chemicals an eyewash and shower are installed in the area. If necessary, the person will then be taken to the hospital for treatment.

In the event of incinerator over-fire the incinerator has an automatic internal quenching system to control an over-fire condition.

The above was prepared by Theodore J. Traum, a registered Pennsylvania engineer, former chairman of the Philadelphia Federal Safety and Health Council, and former safety officer for the Department of Health and Human Services, Region III office. He has vast experience in the fields of safety and industrial hygiene. Mr. Traum is a member of the National Fire Protection Association with experience in boiler facilities, incinerator facilities and foundry facilities and is knowledgeable of hazards associated with these operations.

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT B.1 SOURCES, TYPES, AND WEIGHT OF SOLID WASTE TO BE PROCESSED

The source of all waste processed is from material receiving, manufacturing process and office trash. The waste generated at this facility is categorized as Types 0 and 5. Included in this waste stream is paper attached to it, wooden pallets, corrugated cardboard, small amounts of non-processable or saleable foam, waste fuel oil, waste lubricating oil, methanol, and Di-Methylformamide.

Material	B.T.U. value/lb.	Projected % of waste stream	Projected Hrly. Wt. in lbs.	Content by weight in percentage	
				Moisture	Ash
Type 0 Waste	8,500	87%	500	10	5
Type 5 Waste	10,000	13%	<u>75</u>	0	0
Total Waste lbs./hr.			=	575	

The process of incineration is the volumetric reduction of wastes into sterile ash. The presence of chemicals in the ash has to be monitored. Ash sampling and testing is performed as described in Title 25, Section 283.403.

There are no special environmental pollution on handling problems associated with these materials.

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT B.2 METHOD TO CONTROL FLOW OF WASTE TO FACILITY

Access to the facility will be by authorized personnel only. Waste will only be accepted at the incinerator by the operator after inspecting the waste to determine that it was generated on-site. No off-site is accepted. Foamex's security force monitors the security of the facility and its surrounding areas.

The following is a material flow diagram for the Foam L.P., Eddystone plant

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT B.3 INTERIOR DIMENSIONS

The layout of the entire incinerator facility is shown on Drawing DER-4. The tipping floor area measures 84 square feet. The storage area measures 720 square feet. Sufficient area is found within the entire complex for personnel travel and Foamex travel.

Additional storage area of 500 square feet is provided in the back-up storage area. This area is located directly next to the incinerator. Storage area is located throughout the Foamex plant to provide a total of several days storage capacity.

Ingress and egress to the incinerator room is by fire rated doors. There are four places of access/egress to the incinerator room.

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT B.4 SIZE, TYPE, CAPACITY, GENERAL SPECIFICATIONS OF
EQUIPMENT

Most of the waste delivered to the incinerator is placed in cardboard containers, (gaylords), measuring 48" x 48" x 42" in size. Liquid wastes are placed in standard fifty-five drums or five gallon pails.

General specifications for the incinerator equipment and the liquid injections system are described in the following vendor spec sheets.

The ash storage container is a standard thrity-five cubic yard roll-off type container (8' x 23') with a tarpaulin top.

KELLEY LIQUID WASTE FEEDERSYSTEM DESIGN

The Kelley Liquid Waste Feeder is designed for use with the Kelley Pyrolytic Incinerator. It is automatically controlled and allows disposal of liquids at the same time as solid waste is disposed of. The system can handle liquid wastes commonly generated by industrial plants and hospitals.

The system consists of three assemblies; tank and flow control unit, injector and control box.

Installation requires that the control box be wired to a junction box on the tank and flow control unit and to the injector, and that pipe connection be made between the tank and flow control unit and the liquid injector.

The liquid feed rate is fully modulated and controlled by the incinerator exhaust temperature. It modulates at two temperature set points, upper and lower set point.

At the upper set point, the feed rate decreases on temperature rise. This action occurs when burning liquids with high BTU values, which drive up the exhaust temperature and thus the exhaust temperature is limited to a pre-set limit. The lower set point comes into action when feeding liquids with low BTU values, such as water based liquids, which drive down the exhaust temperature.

At the lower set point, the feed rate decreases on temperature drop. The purpose of the low end modulation is to assure that

minimum combustion temperatures are maintained in order to achieve complete burnout in the incinerator thermal reactor.

When the exhaust temperature stays between the upper and lower set point, full liquid feed rate is maintained.

Liquids are injected into the upper portion of the pyrolysis chamber. The liquid is atomized by compressed air in an atomizing nozzle. Compressed air is used for atomization in order to maintain atomization throughout the whole range of flows. The liquids evaporate above the solid waste firebed and then flow to the thermal reactor, where they are ignited and complete burnout is achieved.

If the liquid contains heavy particles, these will fall by gravity into the pyrolysis chamber firebed due to the low velocities and turbulence level in the pyrolysis chamber.

TANK AND FLOW CONTROL UNIT

The tank and flow control unit is prewired and pre-piped. It contains the pump, motorized flow control valve, manual valves, pressure and vacuum switches, liquid screen and a 120 gallon holding tank. These components are all enclosed in a steel cabinet with doors for easy service access.

The cabinet is equipped with a guage panel for monitoring of liquid pressure and vacuum and also an atomizing air pressure guage and regulator. An on/off switch permits start-up and shutdown of the system.

All wiring and electrical components in the tank and flow control unit are housed in explosion proof enclosures.

ATTACHMENT B.4

The tank is equipped with level switches for control of feed pump and also for a transfer pump if liquids are automatically supplied to the 120 gallon tank.

The pump suction line is connected at a point approximately 1/2" from the bottom of the tank in order to prevent the heavy solids from entering the system.

A drain valve is located at the bottom of the tank and this allows draining of the tank should large amounts of heavy solid accumulate at the bottom. There is a 12" by 12" opening on the top of the tank allowing manual dumping of liquids.

The system uses a fixed displacement feed pump, which assures that the feed rate is maintained even if pressures vary due to liquid viscosity, or by partial nozzle plugging.

Two styles of pumps are used, progressing cavity pump and gear pump. The progressing cavity pump uses a screw type rotor in an elastomer stator. Since the stator is flexible, this pump can handle liquids with solid particles. The stator is compatible with oil base liquids, alcohol, water base liquids and some solvents. It's not compatible with ether, lacquers or lacquer solvents, or ketones.

The gear pump is employed for liquids not compatible with the materials of the progressing cavity pump. The gear pump uses Teflon seals, which are chemically compatible with almost all liquids. However, the gear pump cannot handle liquids containing solid particles.

The gear pump is equipped with an internal relief valve, which limits the pipe pressure to 100 psi.

ATTACHMENT B.4

The pump draws the liquid from the tank through a 1-1/2" pipe. The flow velocity in the suction side is low, maximum ten feet per minute. The suction line is equipped with a strainer to protect the pump. It is also equipped with a vacuum switch, which will shut down the pump in case of excessive vacuum.

The pressure side of the pump is connected to the injector, which feeds the liquid into the incinerator, and also connected via a return line back to tank. A motorized metering valve in the return line controls the flow back to tank and thus the flow to the injector. The pressure side is equipped with a pressure unit switch in order to shut down the pump in case of line plugging.

The piping is supplied with manual valves to allow service to be performed without draining the entire system. The piping is also supplied with numerous pipe unions, again for easier servicing.

INJECTOR

The liquid injector assembly is extended into the pyrolysis chamber and retracted by a pneumatic cylinder. It is automatically retracted when the pumps are shut off in order to protect the nozzle from heat when no liquid is flowing. A cam actuated cap covers the injection port when the nozzle is retracted.

The nozzle uses compressed air to atomize the liquid. The liquid orifice is large, 5/16", in order to keep the nozzle tip from fouling or plugging when used with liquids containing solid particles. The design of the nozzle is such that the liquid flows straight through the center and thus reducing the opportunity for solids to accumulate.

The atomizing air and liquid is mixed outside the nozzle and the liquid breakup is accomplished by four air jets directed towards the liquid stream as it leaves the nozzle. The liquid leaves the nozzle at low pressure, 5-15 psi.

CONTROLS

The system is controlled from a central control panel, which is independent from the incinerator and feeder control panel. The only connection the liquid injection system control has with the incinerator control is the charge door limit switch. The other necessary interface controls are provided by temperature sensors located in the pyrolysis chamber and the incinerator exhaust.

The control panel is equipped with an on/off switch for manual shutoff and pilot lights indicating high vacuum or high pressure conditions.

There are three temperature controllers in the control panel. Two of these are proportional, i.e. modulating, controllers and one is an on/off controller. All the temperature controllers are designed such that if they fail, they will fail in a safe mode.

The modulating controllers sense the exhaust temperature and control the motorized valve in the liquid return line. One controls the upper modulation set point, and the other the lower modulation set point. The upper modulation set point controller has an auxiliary set point, which switches the temperature control function over to the lower set point controller at a temperature approximately half way between the upper and lower modulation set points.

The control action of the modulating controllers is such that when a decreased liquid feed rate is called for by the exhaust temperature,

the motorized valve opens and thus more liquid is returned to the tank, leaving less for the nozzle.

A limit switch operated by a cam on a slip clutch arrangement is mounted on the flow control modulating motor. This limit switch senses the rotational direction of the modulating motor and is connected to an adjustable repeat timer. This timer makes it possible to control the time required to close the modulating valve and can be adjusted such that it takes up to one full hour to increase the liquid feed rate from 0% to 100%. This timer eliminates the risk of the exhaust temperature overshooting its set limit due to time lags in the combustion system.

When the modulating valve opens, i.e. decreases the feed rate, the limit switch bypasses the timer and the feed rate will decrease from 100% to 0% in 50 seconds. This is done so that the system can react quickly if there is a combustion surge from solid waste being charged.

The pump is interlocked with the main chamber temperature by the on/off controller. The purpose of this is to assure that there is a certain minimum pyrolysis chamber temperature for a safe light-off.

A time delay relay allows the valve to return to its open position at start-up so that lightoff will take place at a low liquid feed rate, again to assure safe lightoff.

The pump is interlocked with the vertical charge door of the solid waste feeder on the incinerator so that no liquid will flow during the feed cycles. This is to prevent potential liquid flashbacks.

A time delay is incorporated for the pneumatic cylinder air valve so that when the pumps shut down, the nozzle will stay extended for a short period of time in order to let the injector drain into the pyrolysis chamber rather than on the outside of the pyrolysis chamber.

The injector is equipped with a limit switch, which keeps the pump and atomizing air from activating until the injector is extended, again to prevent liquids from draining on the pyrolysis chamber.

The tank assembly includes three ultrasonic type liquid level controllers, one low level controller and two high level controllers. In case of low liquid level in the tank, the system will automatically shut down and the nozzle will be retracted. The same action will automatically be taken, if the vacuum on the pump suction or pressure on pump discharge side exceeds its limits, which are factory preset.

The high level controllers will operate a transfer pump supplying liquids to the tank/flow control unit. One normally controls the pump and the other one is a safety back-up controller to assure that the tank will not overflow in case of failure of the normal controller.

SEQUENCE OF OPERATION

The operation of the Liquid Feed System is automatic.

In order to start the Liquid Feed System, the pyrolysis chamber of the incinerator has to be preheated. This is generally done by loading of the solid waste, but can also be done by preheat with the burner.

When the pyrolysis chamber reaches 800°F., the system is activated. A time delay permits the control valve to move to its fully open position to prepare the system for low-fire start. When the exhaust temperature from the solid waste reaches 1300°F, the valve on the pump return line starts to close. An end switch on the modulating motor closes, the injection nozzle is extended and the pump starts.

Liquid is now being injected into the pyrolysis chamber. If it is a high BTU liquid, the exhaust temperature will rise, the valve will close further until maximum feed rate is achieved. The time for complete closure is adjustable up to one hour. If the temperature reaches 1600°F, the valve again starts opening and the feed rate is cut back. Thus, the valve controls the temperature so that it will stay at the set point.

If solid waste is charged at this point, the exhaust temperature will rise further, and the modulating valve will cut back on the liquid feed rate.

The temperature controlled valve thus assures that the exhaust temperature doesn't exceed the incinerator design temperatures, which in turn are related to the heat release. As the heat release from the solid waste tapers off, the exhaust temperature drops and the liquid feed rate is increased. In essence, even exhaust temperatures are maintained as long as high BTU liquids are available.

When burning low BTU liquids, the liquid will cause the exhaust temperature to drop. When the temperature drops below 1500°F, the liquid flow rate will start to cut back to prevent further temperature decrease. This means that when burning low BTU liquids, solid waste in sufficient quantities must be available to maintain minimum combustion temperature or the liquid feeder will shut down.

Should at any time during liquid feed the pyrolysis chamber drop below 800°F, the pump will shut down and the nozzles will retract.

During the operation, whenever the exhaust temperature is outside the operating range, i.e. not between upper and lower set point, the pump will shut down and the system be deactivated.

POWER/AIR REQUIREMENTS

The system operates on 110 volt single phase power. The maximum operating current is 10 amps.

Nozzle and pneumatic cylinder requires compressed air. Maximum consumption is 25 SCFM and maximum required pressure 40 psig.

APPLICATIONS

The Liquid Feed System is designed to handle most liquid wastes generated by industry. This includes cutting oils, lube oils, alcohols and solvents.

The liquid must be pumpable. For any liquids with a viscosity above 5,000 SSU, equivalent to No. 6 fuel oil or 30 weight lubricating oil, consult factory.

When liquids are part of the waste stream, the incinerator is sized in the same manner as when sizing for solid waste only, i.e. by BTU Value and lbs./hour.

BTU values for liquids are generally given in BTU's per gallon and amounts of liquids generated per day generally in gallons per day. To convert from BTU per gallon to BTU per lb., simply divide by the density of the liquid. When converting from gallons per day

to lbs. per day, multiply by the density. The density generally will fall between 7 and 9 lbs. per gallon.

In addition to liquid disposal during the regular solid waste feeding hours, it's possible to dispose of liquids during the burndown. The thermal capacity of the incinerator and the BTU value of the liquid then determines the amount of liquids that can be disposed of during burndown.

When disposing of high BTU liquids, the burning rate will equal the feed rate, as opposed to when burning solids in which case the feed rate is higher than the actual burning rate. Accordingly, the following guidelines should be used for sizing liquid waste consumption during periods when only liquids are disposed of.

Thermal Capacity: 2500, 14,000,000 BTU/hour
 1280, 7,500,000 BTU/hour
 780, 4,750,000 BTU/hour
 380, 2,500,000 BTU/hour

In the initial phase of the burndown, some solids will be burned, generally during the first two hours. During this period the liquid feed rate will increase as the heat release from the solid waste decreases. For sizing purposes, the average liquid feed rate during this initial phase equals half of the thermal capacity of the incinerator model.

Example. Model 1280 disposing of liquids during burndown. How long will it take to dispose of 200 gallons of 125,000 BTU per gallon liquid.

Maximum liquid feed rate: $7,500,000 \div 125,000 = 60$ gallons per hour.

Feed rate during initial burndown phase equals 30 gallons/hour.

Liquid disposed of during the first two burndown hours: $30 \times 2 = 60$ gallons.

Liquid left after initial burndown phase: $200 - 60 = 140$ gallons.

Time to burn: 140 gallons = $140 \div 60 = 2.33$ hours.

Total liquid burn time after beginning of burndown: $2 + 2.33 = 4.33$ hours.

UNIQUE FEATURES

Several features on the liquid feeder are unique. The main feature is the modulated feed rate. It enables the user to use spare heat release capacity of the incinerator when the incinerator is charged at less than rated capacity such as during lunch hour and burndown. It also stabilizes the heat output of the incinerator, and if equipped with a boiler, the steam output.

The system is operated automatically, i.e. it automatically comes on and off without operator interference. This automatic control is also valuable in that liquid can be disposed of during periods when no full time operator is available.

The retractable nozzle is unique. The retracting feature extends the life of the nozzle and also reduces the possibility of plugging when burning liquids that can set up by heat.

The system is packaged in a standard configuration. The skid mount simplifies the installation.

Fixed displacement pump with return valve modulating is also unique. It allows system pressure to vary when liquid viscosity varies without changing flow rate characteristics.

Injection assembly does not include a burner. Liquid is simply evaporated in the pyrolysis chamber and heavier particles contained in the liquid will drop down into the firebed. The nozzle has a large orifice and is of simple construction.

September 29, 1980.

KIE/mf

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT B.5 ANTICIPATED RECOVERY RATE OF MARKETABLE MATERIALS
AND ENERGY RECOVERY

Based on the 2nd quarter, 1991 report, it is estimated that the energy recovered from the incinerator/energy recovery boiler process was 34 Million BTU/Day.

There are no marketable materials as a result of the incineration process.

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT B.6 ASH COMPOSITION

Ash is tested quarterly in compliance with regulation Section 283.403. Results for these tests have been forwarded to the PADER on a quarterly basis. Attached are the most recent sample analysis test results.

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT B.7 LOCATION AND METHOD FOR DISPOSAL, STORAGE OR
PROCESSING OF ASH, RESIDUE OR WASH WATER
PRODUCED BY OPERATION OF THE FACILITY

Ash is accumulated and stored in a covered thirty-five cubic yard roll-off container. The container is placed on a monolithic, concrete, pad located outside the incinerator room. The accumulation on generation rate of ash is such that it is disposed of quarterly at the Grand Central Sanitary Landfill, in Pen Argyl, PA.

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT B.8 ASH DISPOSAL

Foamex L.P. is already contracted with Banta's County disposal service to haul their ash.

The ash is hauled to:

Grand Central Sanitary Landfill
1963 Pen Argyl Road
Pen Argyl, PA 18072

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT B.9 WASTE STORAGE

This facility can have as little as no material queued for incineration or as much as 3,000 pounds. Storage times can vary from less than one hour to two days.



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date April 15, 2005

Time Start _____

Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT☒ **GENERATOR**☐ **S Q GENERATOR**Company name Foamex I.D. Number PAD002274975Site Address 1500 East 2nd Street Eddystone, PA 19022County Delaware Municipality Eddystone Borough Zip 19022Name of Inspector Paul JardelName & Title of Responsible Official James Gatto, Env., Health and SafetyPerson Interviewed SAA Telephone (610) 499-7824

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: >2200 Pounds _____ Kgs _____**1. Site Characterization:**STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☒ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad**2. Universal Waste:** ☐ Large Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types Fluorescent bulbs**3. Hazardous Waste Transporters:**Transporter Name Republic Env Systems (Phillips Services) License Number AH0317Transporter Name Env Waste Minimization Inc License Number AH0682Transporter Name Horwith Trucks License Number AH0176**4. Types of hazardous waste generated and destination facility (location & type).**

Waste Code	Waste Description	Destination Facility
D001	mineral spirits	Republic
U223, D003	Toluene diisocyanate (TDI)	Republic/Ross, Grafton OH
U226	1,1,1-TCE	Republic
D001	N-Ethylmorphine (NEM), polyol resin	Republic/EQ RR Inc, Mich.
U028	DI2-Ethylhexyl phthalate	Republic
D008, D009	Misc	Republic
D001, U003	Lab packs	CVCC, Lewisberry, PA
D004-D008	Hexabromocyclododecane	Michigan Disp. Waste Treat.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Foamex ID Number PAD002274975 Date 4/15/2005

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Foamex ID Number PAD002274975 Date 4/15/2005

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Foamex ID Number PAD002274975 Date 4/15/2005

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tanks labeled to accurately identify contents	265a.194		H044
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Required inspections completed and documented in operating log	265a.195	265.195	H045
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special small quantity generator requirements	265a.1	265.201	H048
				SQG TANKS			
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All waste removed at closure	265a.1	265.201(d)	H056
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Incompatible waste requirements met	265a.1	265.201(f)	H059


Foamex

2005 FEB 15 PM 12:04

February 14, 2005

Mr. Paul A. Jardel
Waste Management Specialist
Waste Management Program
Pennsylvania Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

Foamex International, Inc.
1500 East Second Street
Eddystone, PA 19022
Telephone # 610-499-7824
Facsimile # 610-876-9405


Re: Notice of Violation (January 31, 2005)

Dear Paul:

This letter is a follow up to the phone conversation we had last week regarding the Notice of Violation (NOV) that you sent to Foamex on January 31, 2005. The NOV as reported was as follows: **containers of hazardous waste were observed out of secondary containment, contrary to 265a.179**. As we spoke on the phone, the violation has been addressed and the secondary containment has been ordered and will be installed as soon as it arrives at Foamex.

If there are any questions or concerns, please feel free to contact me at the number above.

Sincerely,


James D. Gatto

Environmental, Health, and Safety Manager

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection 4/15/05 Identification Number PAD002274975Company/Facility/Site Name Foamex Inc.

This hazardous waste large quantity generator (LQG) follow up inspection was done by Department Solid Waste Specialist Paul Jardel along with Mr. Jim Gatto, Environmental Health & Safety Manager of Foamex.

The single violation from the 1/28/05 facility inspection was regarding the lack of proper secondary containment for two hazardous drums stored in the R&D building.

There were three labeled drums on a portable secondary containment pallet near one of the labs where the waste is generated. Two of the drums were empty and one contained a few gallons of waste. This action will serve to abate the violation of 265a.179.

No violations were observed during this inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Jim Gatto Date 4/15/05
Inspector (signature) [Signature] Date 4/15/05

Copy given to facility

Page ____ of ____



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date August 27, 2002Time Start 8:55Time Finish 16:00**HAZARDOUS WASTE INSPECTION REPORT****GENERATOR****S Q GENERATOR**Company name Foamex I.D. Number PAD002274975Site Address 1500 East 2nd Street Eddystone, PA 19022County Delaware Municipality Eddystone Borough Zip 19022Name of Inspector Kevin BauerName & Title of Responsible Official Jay Patel, Plant Manager Anthony Conte, Env., Health and SafetyPerson Interviewed Anthony Conte Telephone (610) 499-7824

Mailing Address (if different from above) _____

☐ Amount of Hazardous Waste Generated per Month: >2200 Pounds _____ Kgs _____
1. Site Characterization:STORAGE: ☒ Container ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____PBR: ☒ Neutralization/WWTP ☐ Reclaim Other _____GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad**2. Universal Waste:** ☐ Large Quantity Handler ☒ Small Quantity HandlerUniversal Waste Types Fluorescent bulbs**3. Hazardous Waste Transporters:**Transporter Name Republic Env Systems License Number PA-AH0317

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

☐ **4. Types of hazardous waste generated and destination facility (location & type).**

Waste Code	Waste Description	Destination Facility
D002	Caustic waste / Sodium hydroxide	Republic
D001	mineral spirits	Republic
U223, D003	Toluene diisocyanate (TDI)	Republic
D001	N-Ethylmorphine, polyol resin	Republic

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Foamex ID Number PAD002274975 Date 8/27/2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Identification Number	262a.10	262.12	H002
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Authorized transporters only	262a.10	262.12(c)	H003
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Subsequent notification requirements met	262a.12(b)		H004
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper manifest used	262a.10	262.21	H005
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests filled out correctly and completely	262a.20		H006
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests signed and routed properly	262a.23(a)	262.23	H007
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Specified records retained for three years	262a.10	262.40(c)	H014
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exception reporting procedures followed	262a.42	262.42	H016
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spill reporting procedures followed	262a.10	262.34(d)	H017
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PPC plan developed and implemented	262a.10	262.34(a)	H018
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements followed for international shipments	262a.10	262.50 262.60	H019
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Source reduction strategy prepared and available (LQG only)	262a.100		H020
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name Foamex ID Number PAD002274975 Date 8/27/2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
CONTAINERS (Subchapter I)							
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers of hazardous waste in good condition	265a.1	265.171	H026
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers and stored waste compatible	265a.1	265.172	H027
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers managed to prevent leaks	265a.1	265.173(b)	H029
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container storage areas inspected at least weekly	265a.1	265.174	H031
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Proper containment and collection systems in place	265a.179		H033
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection ID _____

Field Code _____

INSPECTION REPORT – RESIDUAL WASTE GENERATOR

Site I.D.: PAD002274975
 Site Name: Foamex
 Address: 1500 East Second Street
Eddystone, PA 19022
 Municipality: Eddystone Borough
 Responsible Official: Jay Patel, Plant Manager, Anthony Conte
 Person Interviewed: Anthony Conte
 Inspector: Kevin Bauer
 eFACTS ID #: PF _____ SF _____

Telephone #: 610-499-7824
 Operator Name: _____
 Address: _____
 County: Delaware
 Title: Environmental, Health, and Safety Mgr
 Title: SAA
 Title: Waste Management Specialist

Inspection Date: 08 /27 / 2002 Type: Routine No. of Violations: see report Time: 8:55

Waste Description: Wastewater from chemical & thermal reticulation Waste Code: 420

Treatment: ☒ Yes ☐ No Type: On-site PBT treatment plant

Type of Storage: ☐ Containers ☒ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility On-site PBR discharged to Delaware via NPDES Permit

Location: _____ Type: WWTP

Amount Generated: 67000 tons / yr lb./mo.

Waste Description: Scrap foam mixed with plastic, wood, cardboard Waste Code: 407

Treatment: ☐ Yes ☒ No Type: _____

Type of Storage: ☒ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility American Ref-Fuel

Location: Chester, PA Type: Incinerated

Amount Generated: 125 tons/ yr lb./mo.

Waste Description: Waste water from vinyl coating operation Waste Code: 306

Treatment: ☐ Yes ☒ No Type: _____

Type of Storage: ☐ Containers ☒ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility Republic

Location: Hatfield, PA Type: treatment

Amount Generated: 22 tons/ yr lb./mo.

Waste Description: Aqueous nonhaz solvent for machine parts clean Waste Code: 316

Treatment: ☐ Yes ☒ No Type: _____

Type of Storage: ☒ Containers ☐ Tanks ☐ Piles ☐ Impoundments

Disposition: Destination Facility Republic

Location: Hatfield, PA Type: treatment

Amount Generated: 4 tons/ yr lb./mo.

Site Name Foamex
ID Number PAD002274975
Date 8/27/2002

INSPECTION REPORT - RESIDUAL WASTE GENERATOR (Cont'd)

Waste Description: <u>Dyes from foam process</u>	Waste Code: <u>308</u>
Treatment: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Type: _____
Type of Storage: <input checked="" type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility <u>Republic</u>	
Location: <u>Hatfield, PA</u>	Type: _____
Amount Generated: <u>3 tons / yr</u>	lb./mo. _____
Waste Description: <u>Resin (polyol) from foam machines</u>	Waste Code: <u>440</u>
Treatment: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Type: _____
Type of Storage: <input checked="" type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility <u>Republic</u>	
Location: <u>Hatfield, PA</u>	Type: _____
Amount Generated: <u>31 tons / yr</u>	lb./mo. _____
Waste Description: <u>waste oil</u>	Waste Code: <u>509</u>
Treatment: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Type: _____
Type of Storage: <input checked="" type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility <u>Republic</u>	
Location: <u>Hatfield, PA</u>	Type: _____
Amount Generated: <u>3 tons / yr</u>	lb./mo. _____
Waste Description: _____	Waste Code: _____
Treatment: <input type="checkbox"/> Yes <input type="checkbox"/> No	Type: _____
Type of Storage: <input type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility _____	
Location: _____	Type: _____
Amount Generated: _____	lb./mo. _____
Waste Description: _____	Waste Code: _____
Treatment: <input type="checkbox"/> Yes <input type="checkbox"/> No	Type: _____
Type of Storage: <input type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility _____	
Location: _____	Type: _____
Amount Generated: _____	lb./mo. _____
Waste Description: _____	Waste Code: _____
Treatment: <input type="checkbox"/> Yes <input type="checkbox"/> No	Type: _____
Type of Storage: <input type="checkbox"/> Containers <input type="checkbox"/> Tanks <input type="checkbox"/> Piles <input type="checkbox"/> Impoundments	
Disposition: Destination Facility _____	
Location: _____	Type: _____
Amount Generated: _____	lb./mo. _____

Site Name	Foamex
ID Number	PAD002274975
Date	8/27/2002

INSPECTION REPORT - RESIDUAL WASTE GENERATOR (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

[illegible]

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection August 27, 2002Identification Number PAD002274975Company/Facility/Site Foamex

A routine inspection of the hazardous and residual waste activities occurring at Foamex located in Eddystone Borough, Delaware County was conducted on August 27, 2002, by Mr. Kevin Bauer of the Department. Mr. Anthony Conte, Environmental Health & Safety Manager, was present for the facility. Mr. Jay Patel, Plant Manager, was met during the inspection. The following observations were noted:

1. Foamex manufactures foam and foam products and is currently listed by the USEPA as a large quantity generator (LQG) of hazardous waste with an EPA identification number of PAD002274975. The facility is also a LQG of residual waste.
2. The main plant (building 1) is divided into two sides: foam production and technical foam production. Max foam is produced in foam production, and on the technical side, foam is manufactured using a log foam machine (LFM) and a continuous traverse machine (CTM). The main ingredients of all the foams are water, toluene diisocyanate (TDI), polyol, and dye.
3. In foam production, the units' troughs are cleaned with an isopropyl alcohol (IPA) and NMP mixture. The waste is non-hazardous. A hazardous waste determination was reviewed. The waste is drummed and shipped to Republic. Polyol, a resin, is collected in an overflow drum and also disposed as a residual waste. Waste TDI is generated at a pump house when the pumps need repaired or cleaned. A satellite accumulation drum in the area was labeled and closed. Scrap foam from this production area as well as CTM and LFM is baled and sent to another Foamex facility for manufacturing into rebound (carpet padding). There are two baling areas on-site.
4. The CTM and LFM production areas are side-by-side but can only operate one at a time. Polyol / N-ethylmorpholine flushed from the lines of the CTM and LFM units is collected in a drum in a satellite accumulation area. The drum was labeled and closed. Dyes (non-hazardous) are also flushed and collected in a drum. TDI is satellite accumulated by a pump station by the CTM unit. The drum was closed and labeled.
5. In a drum heel drainage room, drums are placed upside down on a rack and drained of remaining materials. Dyes are collected and placed into a 55-gallon drum labeled as non-hazardous. Remaining fluids are collected and placed into a drum / container labeled as hazardous. Testing has shown that the material is non-hazardous, but Mr. Conte stated that he would have the drum, when filled, retested to ensure that it is non-hazardous.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____

Inspector (signature) Kevin C Bauer Date 8/27/02Page 7 of 9

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection August 27, 2002Identification Number PAD002274975Company/Facility/Site Foamex

6. After the CTM and LFM units and any cutting / trimming, the foam is treated using either thermal or chemical reticulation. These processes clear away membranes within the foam and form pore spaces. Foamex utilizes two bun zappers and one roll zapper in the thermal reticulation production area. An enclosed unit containing the foam is flooded with oxygen and hydrogen and then ignited with a spark. The resultant explosion clears away the membrane. The unit is cleaned out every three to four months and the waste is drummed and shipped as a D003 reactive waste. The process also generates a wastewater containing cyanide that is piped over to the on-site wastewater treatment plant (WWTP), known as CAPTOR.

7. Chemical reticulation involves running the foam through a quench tank containing sodium hydroxide and then through series of rinse tanks. Rinse waters from the process enter a floor sump and are piped into a neutralization pit. The concentrate from the quench tank, dumped every one to two weeks, is collected into an outside storage tank and slowly metered over to the neutralization pit. The storage tank was previously labeled as "D002 - NaOH". In the neutralization pit, the wastewater is neutralized to a pH of between 5 - 9 using CO₂. The CO₂ unit has a back up pump, if necessary, and is alarmed if both pumps fail. Approximately 40 gallons per minute flow through the unit. After neutralization, the water is collected in two tanks at the CAPTOR unit. Water is fed into a bioreactor containing activated sludge obtained from Delcora. The bugs in the sludge remove nitrogen thus treating the cyanide in the wastewater. Defoamer is added, if needed, and the wastewater is then run through a clarifier before discharge to Delcora (NPDES. PA0027103). The outflow is monitored continuously for pH, weekly for CN, and monthly for all other constituents.

It was not determined whether or not the wastewaters entering the CAPTOR unit are hazardous or not. From previously analyses, the wastewaters may all be residual wastes. Foamex should complete a hazardous waste determination on all three wastewater streams entering the system. If the wastewaters are determined to be residual waste, then the tank should be stenciled as "residual waste, spent caustic". Foamex should also ensure the tank has a level gauge and an overflow alarm. The containment area for the tank should be cleaned of all weeds and inspected to ensure that it is still structurally sound. The treatment would also fall into the category of Permit-By-Rule Captive Processing. (287.102(b)). Records of the amount treated are already completed. An updated notification would need to be submitted to the Department.

8. Some of the foam goes through a felting process and others get vinyl coated. In the vinyl coating process, water based or mineral spirit formulations are used. Waste from mineral spirit formulations is placed

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This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____

Date _____

Inspector (signature) _____

Date 8/27/02

Commonwealth of Pennsylvania
Department of Environmental Protection
Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection August 27, 2002Identification Number PAD002274975Company/Facility/Site Foamex

into a 55-gallon drum. The drum was closed and labeled. The waste previously was discharged into an outside tank that is now used for the collection of the water-based formulations. The tank was recently painted. The tank was in containment but should be relabeled as "residual waste, vinyl coating wastewater". The tank level gauge should be repaired and a high level alarm should be installed. (299.122)

9. The hazardous waste storage pad was inspected. Two hazardous waste drums on the pad were labeled, dated, closed, and in containment. Residual waste drums were also properly labeled and stored.

10. Satellite accumulation areas in research & development were reviewed and in compliance.

11. The hazardous waste storage area inspection reports were reviewed. Residual waste storage areas should also be routinely inspected. Foamex should institute an inspection program for all the residual waste storage areas and document the inspections.

12. The hazardous and residual waste biennial reports, the facilities PPC plan revised January 2002, training documents, hazardous and residual waste source reduction strategies (SRS) - 25Rs, 26Rs, and manifests were reviewed. Foamex should ensure that it has SRS for all waste streams and has submitted the 26Rs annually to the Department and to the receiving facility.

13. Foamex had one of its trailers stolen and filled with tires before being dumped off, and a different trailer not owned by Foamex and filled with tires was dumped off on its property. A sticker with information and a tag on the axle was obtained. The Department will investigate further.

Foamex should document completion of all the items of concern noted above and submit the documentation to the Department

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Anthony [Signature]Date 8/27/02Inspector (signature) Kevin C. BauerDate 8/27/02Page 9 of 9



PYROLYTIC INCINERATION SYSTEM

SPECIFICATIONS —

MODEL 1280/72

PROCESS DESCRIPTION

The Kelley Pyrolytic Incineration System is a process which accepts combustible waste of varying calorific values via the feeder; converts the waste to a combustible gas under controlled air and temperature conditions in the pyrolytic chamber; achieves complete combustion through ignition of the combustible gas yielding a high temperature CO_2 and H_2O vapor flue gas in the thermal reactor; and ducts the resultant flue gas to the stack for exhaust to the atmosphere.

PYROLYTIC CHAMBER

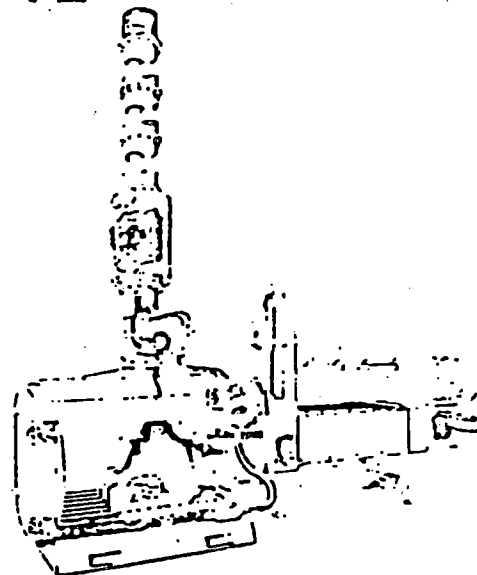
Shell manufactured of hot rolled steel plate. Shell is lined with $9\frac{1}{2}$ inches of insulation and high temperature castable refractory material suitable for operation to $2,500^\circ\text{F}$. The refractory is secured by steel anchors welded to the shell. Embedded in the refractory are two steel air distribution ducts. No grates are required.

The cleanout door (large object charging), providing complete access, is refractory lined and hinged with thrust bearings for manual operation. Two screw type sealing devices and hasp for a padlock are provided. Door to be factory hinged on either right or left as required.

THERMAL REACTOR

The outer shell is manufactured of hot rolled steel lined with 3 inches castable refractory suitable to temperatures of $3,000^\circ\text{F}$. Upper portion (inspirator) includes shroud covered combustion air inlets. Attached to the lower portion are refractory lined inspection ports and provisions for mounting of burners.

Air is introduced into the thermal reactor by natural draft through the inspirator section. This assures minimum outside fuel usage because cold air is drawn in only as demanded by the combustion process. Air is



admitted sequentially along an extended portion of the reactor eliminating quenching of the fire by concentrated infusion of cold air.

Additional combustion air is introduced by a forced air system controlled by a modulating damper.

FEEDER

A heavy-duty semi-automatic charging device consisting of a receiving hopper with hydraulic door, charging ram, refractory lined vertical charging door, refractory lined transition chamber, and hydraulic power assembly with controls.

Fabricated of hot rolled steel plate with a capacity of 72 cu. ft. Feeder opening is 72" long by $54\frac{1}{2}$ " wide by 32" deep. Door is fabricated of hot rolled steel with formed steel structural members. Door operates hydraulically. Door to be factory hinged either right or left as required.

STACK

The stack and spark arrester are manufactured of AISI type 304 stainless steel with flanged sections for bolting together.

SYSTEM RATING

	Type 0	Type 1	Type 2	Type 3
BTU/lb. of Waste (Ave.)	8500	6500	4300	2500
Incinerator Capacity (lb./hr.)	1090	1300	1160	840

SEQUENCE OF OPERATION

1. After feeding hopper is filled, door is shut and locked.
2. Automatic feeding cycle is started by depressing start button until indicator light goes on.
3. Vertical charging door hydraulically opens.
4. Charging ram moves forward pushing load through transition chamber into main combustion chamber.
5. Charging ram retracts to position immediately outside of vertical charging door. Ram face is sprayed with water.
6. Vertical charging door closes.
7. Charging ram retracts to start position.
8. Indicator light goes off. Cycle is complete. Feeder door opens.

CONTROLS

Incinerator Control Panel: The function of this panel is to control combustion air, temperatures and all system modes. It houses temperature controllers, timers, relays and switches in a NEMA 12 enclosure.

Feeder Control Panel: The function of this panel is to control the operation of the feeder. It houses a motor starter, timer, relays and switches in a NEMA 12 enclosure.

AUXILIARY SYSTEM REQUIREMENTS

FUEL:

Natural Gas, Fuel Oil, LPG.

Normal usage 675,000 BTU's per operating hour.

Gas: Piping capable of delivering 1,000,000 BTU per hour at burners. Natural gas at 6" to 8" W.C., LPG at 11" W.C. (sized for start-up usage with pyrolysis chamber burner on.)

Oil: Oil burners equipped with nozzle capacity of one gallon per hour each. One pump is included. Line should be sized for 30 gallons per hour. (2 pipe system)

UTILITY REQUIREMENTS

Required utilities brought to incinerator by others are:

Electrical: Incinerator—115 VAC, single phase
60 HZ, 15 AMP

Feeder—460 VAC, three phase
60 HZ, 20 AMP

MOTOR SCHEDULE—FULL LOAD

	HP	VOLTS	AMPS
Primary Blower	1	460	1.8
Feeder	3	460	4.8
Pyrolysis Chamber Burner (optional)		115	3.0
Thermal Reactor Burner		115	3.0
Mics.—Controls		115	1.0
Add for the Following Options:			
Oil Burner(s) (per Burner)		115	5.8

WATER

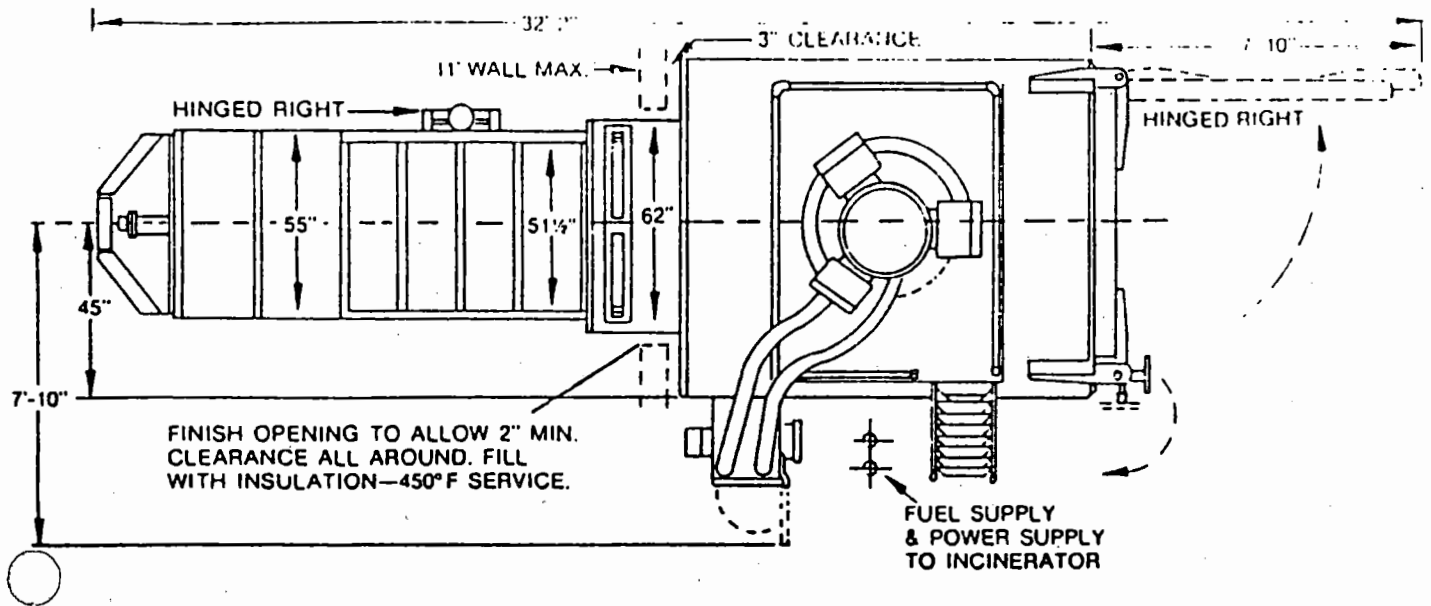
Water (filtered) shall be provided for water spray systems, cleaning and safety. Minimum requirement is ¾ inch line 50 PSIG. Sewer or other drainage provisions should be provided at both feeder side and combustion chamber side. Freeze-up protection is required.

RECOMMENDED MINIMUM SLAB SIZE:

6" CONCRETE. 6" x 6" #6 WIRE MESH REINFORCING. 12'-0" WIDE x 35'-0" LONG

CODES AND REGULATIONS

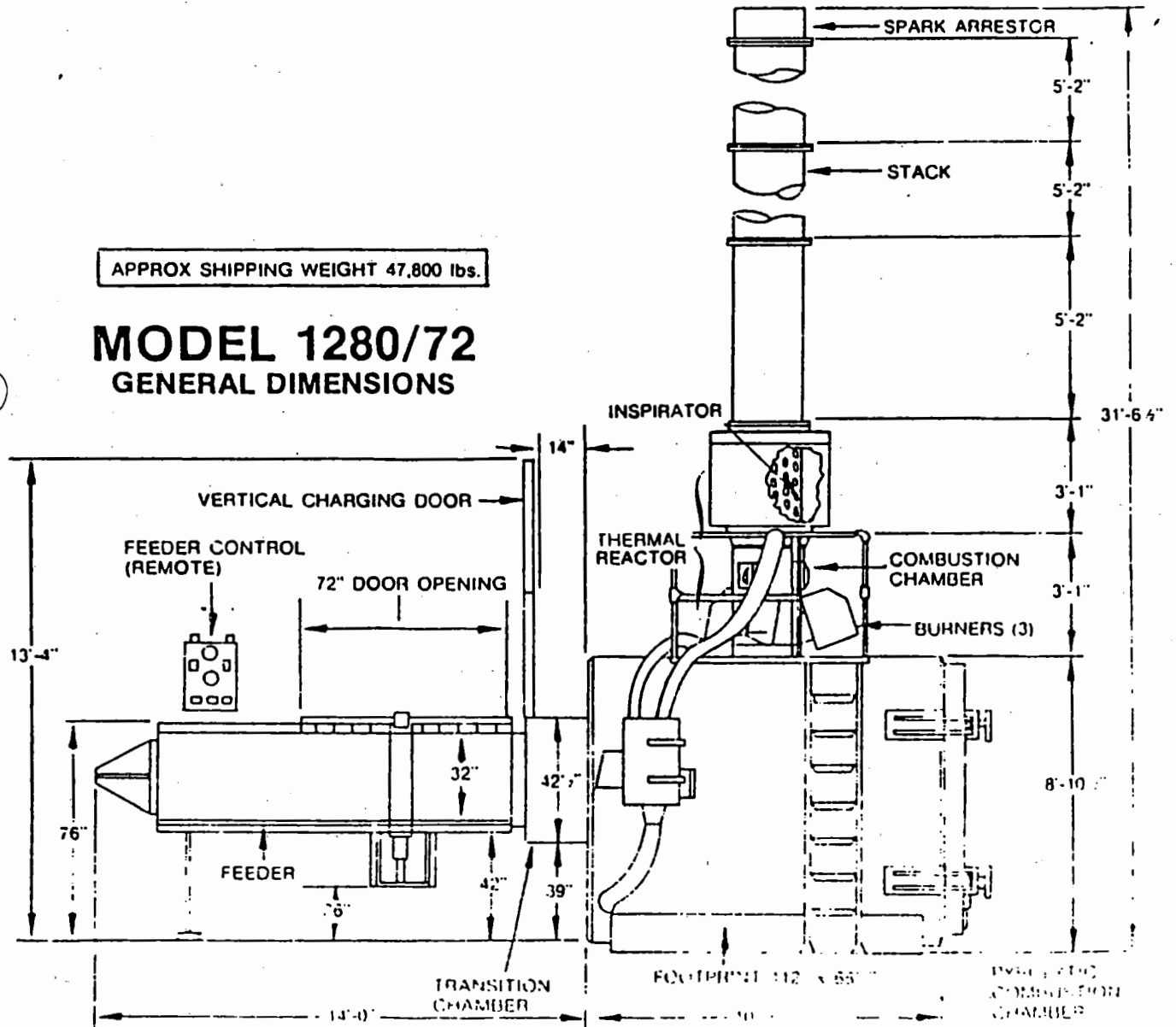
Steps should be taken to determine if equipment and installation is in compliance with all state and local codes, regulations and standards.



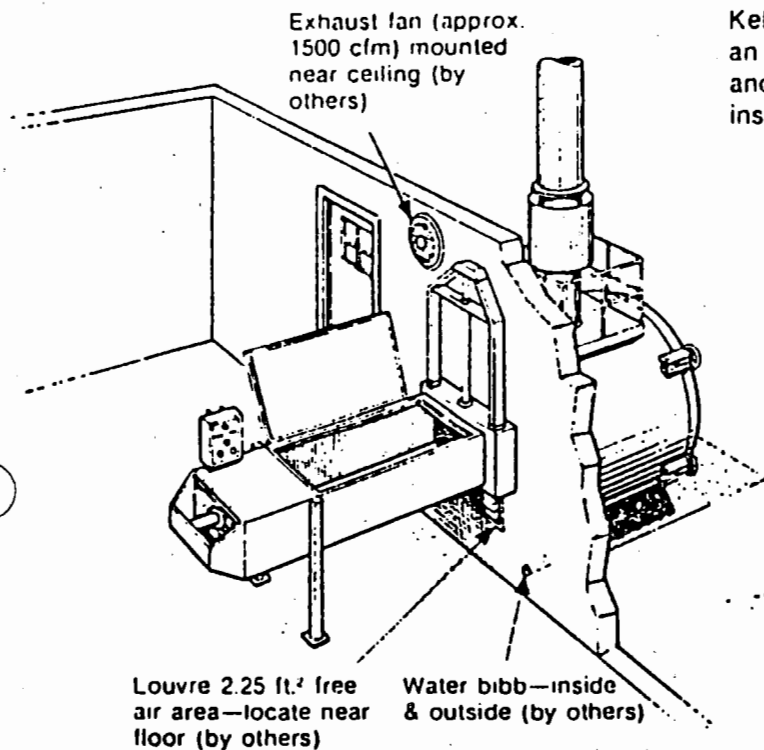
APPROX SHIPPING WEIGHT 47,800 lbs.

MODEL 1280/72

GENERAL DIMENSIONS



TYPICAL INSTALLATION ARRANGEMENTS



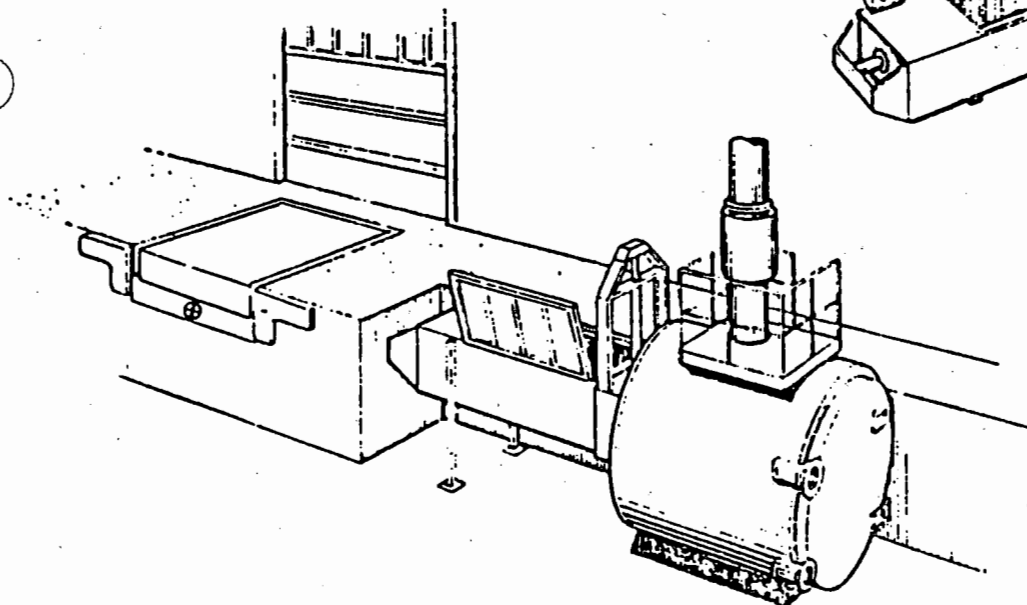
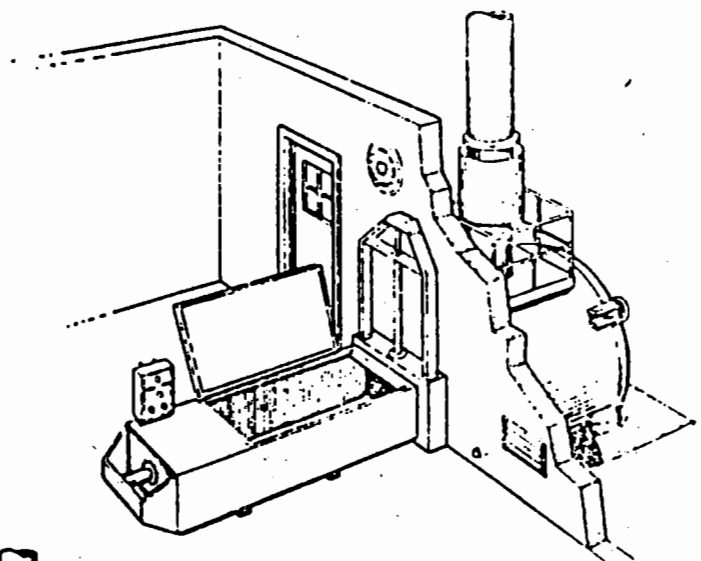
Kelley Pyrolytic Incinerators may be installed on an outside slab or with the feeder inside a building and the burner outside, or with the entire unit inside.

Installations totally within a building require combustion air make-up, special stack exits, thimble, etc. Please consult factory for more information.

NOTE - INSIDE/OUTSIDE INSTALLATIONS

A maximum pressure differential of 0.25 W.C. relative to outdoor ambient must be maintained at the feeder location. The louvre & exhaust fan shown work together to provide ventilation. A closed waste room is strongly recommended. Check local codes.

Typical inside/outside installations
(Feeder may also be recessed in pit to reduce feeder height.)



Outdoor installation requires loading dock for material feeding

KELLEY

Kelley Company, Inc. • 6720 N. Teutonia Ave • Milwaukee, WI 53209
Phone: 414-352-1000 Telex: 26-661

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT B.10 CONTINGENCY PLAN

The contingency plan for waste disposal in the event of extensive incinerator downtime, excessive trash quantities, power failures, will be as originally submitted in this Form 33 under Section A.9 (please refer to that Attachment).

In the event that a processing line within the facility is closed or shut down, and daily waste volumes decrease, Foamex will adjust the incineration schedule. Waste will be stored until sufficient volumes are accumulated to complete a full shift of incineration.

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT B.11 UTILITIES

All utilities are existing on-site. The incinerator facility is existing and therefore, this question is not applicable.

INCINERATOR

FOAMEX L.P.

ATTACHMENT B.12 DESIGNS FOR OPERATING AND MAINTAINING FACILITY
TO PREVENT FIRES, EXPLOSIONS, EMISSIONS, AND EMERGENCIES

The plant manager is responsible for the operation and maintenance of the FOAMEX Eddystone Plant. Policies and organizational responsibilities are established to prevent fires, explosions, emissions and emergencies.

Generally, the plant management oversees operations and maintenance by daily inspection of the plant. Monthly safety inspections are conducted by the safety committee personnel. These inspections follow O.S.H.A. guidelines. Annual equipment inspections are conducted during a plant wide shut down. Construction of the plant is, compartmentalized, with fire rated linked doors. Also the entire plant is sprinklered and has a fire alarm.

The housekeeping program is the responsibility of each area supervisor. These responsibilities include assuring daily refuse pick-up by contract hauler; daily cleaning of production and office areas; and daily chemical storage inspection and monitoring. The areas supervisors adherence to the housekeeping program is evaluated monthly by the safety committee.

Tanks are also inspected by production personnel daily. Also hazardous waste storage areas are inspected weekly by the environmental manager.

Fire extinguishers are checked monthly by each area supervisor with reporting in writing to the Manager of Safety and Health. Maintenance of the extinguishers is by a contract certified fire extinguisher service. The acid neutralization and alarm systems are visually checked daily. The high/low alarm test circuit is tested weekly. The plant's fire protection system (sprinklers, diesel and electric fire pumps and all valves) are checked on a weekly basis. Fire hoses for the plant fire protection system are tested biannually.

The portion of the plant, which is the incinerator facility, has fire, safety and operational qualities in addition to those previously mentioned. It is monitored daily to preclude storage of highly combustible materials. General inspections of the incinerator equipment are made prior to firing of the incinerator. Weekly the incinerator is opened for cleaning and

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT B.12 DESIGNS FOR OPERATING AND MAINTAINING FACILITY
TO PREVENT FIRES, EXPLOSIONS, EMISSIONS, AND EMERGENCIES (cont.)

the hearth is visually inspected. Wastes accepted at the facility are only approved wastes for which the operator has been trained to process. The incinerator is equipped with a overfire control to prevent a uncontrolled fire in the hearth. The operator makes periodic visual inspections of the stack to determine if there are any visual emissions and is trained to respond if an emission is detected. An emergency shower and eyewash are provided in the event of an operator/employee accident. In the event of an emergency, the emergency organization is notified and they take control of the situation until the appropriate emergency response personnel arrive on the scene .

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT B.13 REPAIRS OR REPLACEMENT OF EQUIPMENT

In the event of an equipment breakdown, the plant maintenance personnel will assess the situation and will either repair the problem or call the service vendor. Foamex L.P. is using the services of Energy Products in Broomall, PA to assist them in repairs to the incinerator.

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT F NUISANCE CONTROL

Since the majority of waste stored and processed in the incinerator is paper, paper products, cardboard and wooden pallets, vectors have not been a problem. Foamex's in-house staff perform daily clean-up and housekeeping. In the event that normal procedures do not control vectors, Foamex is contracted for exterminating services with:

Royal Exterminators
2610 Edgemont Avenue
Parkside, PA 19015

Odors should be eliminated because of make-up air requirements for the incinerator.

Noise should be restricted within the facility building. Concrete masonry wall construction and a metal roof deck will insulate the rest of the plant.

Dust is not a problem at the facility. Hose bibs are located throughout the incinerator room for any extreme situations.

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT G LITTER CONTROL PLAN

Litter is not a problem at the Foamex facility. All waste produced is within the buildings. There is not the possibility of litter blowing or becoming deposited off-site. The incinerator room is entirely enclosed.

Waste produced within the Foamex facility is collected in each department and stored in the gaylord containers designated for that area. These are picked up by forklift and transported to the incinerator daily.

FORM 33

INCINERATOR

FOAMEX L.P.

ATTACHMENT H . PUBLIC & PRIVATE WATER SUPPLY FOR RESOURCE RECOVERY
FACILITIES OVER 50 TONS/DAY CAPACITY

The proposed facility will process less than 50 Tons/Day. This
section is not applicable.